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## By ECF

The Honorable Anne Y. Shields United States Federal Courthouse 100 Federal Plaza Central Islip, New York 11722

Re: Cary Scott Goldinger and Law Office of Cary Scott

Goldinger, P.C. v. Hanover Insurance Company,

Index No. 2:19-cv-02232

Dear Judge Shields:

As you are aware, this firm represents Plaintiffs Cary Scott Goldinger and the Law Office of Cary Scott Goldinger (collectively, "Goldinger") in the above-referenced action. We write in furtherance of your Order dated June 20, 2019 (ECF No. 15), requiring the parties to provide an update regarding efforts to resolve the above-referenced action.

Goldinger and Defendant Hanover Insurance Company ("Hanover") are engaged in ongoing discussions regarding the possibility of engaging in a global mediation which would involve parties to the above-referenced coverage action (the "Coverage Action") as well as the underlying legal malpractice action entitled *Marilyn Klugman Trust, by Ilene Klugman Ampel, as trustee, Ilene Klugman Ampel, in her individual capacity, and Kenneth Ampel v. Cary Scott Goldinger and Natalie Elisha,* Index Number 716769/2018 (the "Underlying Action"), which is pending in New York State Supreme Court, Queens County. Parties to the Underlying Action are amenable to such a mediation assuming logistics can be agreed upon and finalized. Because the plaintiffs and co-defendant to the Underlying Action are not subject to this Court's jurisdiction, the parties are reviewing private mediation options.

Due to the complexity of this undertaking and the number of parties involved, Goldinger and Hanover respectfully request additional time to plan and schedule the global mediation. The parties will continue to keep the Court abreast of the parties' efforts to mediate and/or resolve the action.

Respectfully submitted,

Diana Shafter Gliedman

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